

UNITED STATES DISTRICT COURT

for the
Eastern District of Virginia

United States of America)

v.)

DAVID ALLISTER CAMPBELL)

Defendant)

UNDER SEAL

Case No. 2:16mj 216

FILED
MAY - 4 2016
CLERK, U.S. DISTRICT COURT
NORFOLK, VA

SEALED

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 10, 2014 and February 24, 2016 in the city of Virginia Beach, in the Eastern District of Virginia and elsewhere, the defendant violated:

Code Section(s)

Offense Description(s)

Count One:

18 U.S.C. § 2252(a)(2)

To knowingly receive, or distribute, any visual depiction using any means or facility of interstate or foreign commerce or that has been mailed, or has been shipped or transported in or affecting interstate or foreign commerce, or which contains materials which have been mailed or so shipped or transported, by any means including by computer, or knowingly reproduce any visual depiction for distribution using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or through the mails, if (A) the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct; and (B) such visual depiction is of such conduct.

Count Two:

18 U.S.C. § 2252(a)(4)(B)

To knowingly possess, or knowingly access with intent to view, one or more books, magazines, periodicals, films, or other materials which contain visual depictions of minors engaged in sexually explicit conduct that have been mailed, shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed, shipped or transported, by any means including by computer.

This criminal complaint is based on these facts: **Please see attached Affidavit.**

READ AND REVIEWED:

Melissa E. O'Boyle for

Elizabeth M. Yusi

Assistant United States Attorney

☒ Continued on the attached sheet.

Kristin B. Joseph

Complainant's signature

Kristin B. Joseph, Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: May 4, 2016

City and state: Norfolk, VA

Robert J. Krask

Judge's signature

ROBERT J. KRASK
UNITED STATES MAGISTRATE JUDGE

Printed name and title